

JOSEPH & KIRSCHENBAUM LLP

Attorneys at Law

Charles Joseph

D. Maimon Kirschenbaum

Denise Schulman

Josef Nussbaum

Lucas Buzzard

Mike DiGiulio

Leah Seliger

32 Broadway, Suite 601  
New York, NY 10004  
Phone 212) 688-5640  
Fax (212) 688-2548  
[www.jk-llp.com](http://www.jk-llp.com)

August 15, 2025

**Via ECF**

Hon. Peggy Kuo  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Nazaire v. St. Barnabas Hospital, et al.* – No. 1:24-cv-5022**

Dear Hon. Judge Kuo:

We represent Plaintiff Kiara Nazaire (“Plaintiff”) in the above-captioned matter. We write jointly with both Defendants in accordance with the Court’s order dated July 25, 2025, which directed the parties to file a status report certifying the close of discovery. The parties hereby certify that discovery in this matter may be closed.

In addition, the parties have conferred and have agreed to the following proposed schedule for the submission of summary judgment pre-motion letters and Rule 56.1 statements as required by Rule 4.A. of Judge Donnelly’s individual practices.

- October 17, 2025 – Parties to exchange Rule 56.1 Statements
- November 17, 2025 – Parties to exchange Rule 56.1 Counterstatements
- November 24, 2025 – Parties to file pre-motion letters.

The parties respectfully request that the Court approve the above schedule.

We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Lucas C. Buzzard

Lucas C. Buzzard

Leah Seliger

JOSEPH & KIRSCHENBAUM, LLP

32 Broadway, Suite 601

New York, NY 10004

*Attorneys for Plaintiff*